

REMARKS

In the Office Action, claims 1-22 were rejected. Reconsideration and allowance of all pending claims are requested.

Rejections Under 35 U.S.C. § 103

Claims 1-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,466,940 (hereinafter "Mills") in view of U.S. Patent 6,546,387 (hereinafter "Triggs").

Claims 1, 8, 15 and 22 are independent. All of the recited claims are believed to be patentable for the reasons discussed below.

Claim 1 and the Claims Depending Therefrom.

Claim 1 recites, *inter alia*, a method for adding an HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information. The method comprises steps of adding an HTML keyword to the HTML document wherein the HTML keyword represents the respective one of the plurality of categories of information. The HTML document is uploaded to a directory on the web site. A search in the directory is activated when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword. A search engine is called to execute the activated search and produce a search result wherein the search result containing a link to the HTML document in the directory containing the HTML keyword. An up-to-date web page is created for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

Mills fails to teach adding keywords to HTML documents.

The Examiner argued that Mills is believed to teach adding an HTML keyword to the HTML document. The Examiner cited the passages at col. 5, lines 8-20 and lines 32-42, col. 8, lines 58-67 and col. 9, lines 1-25 in support of the rejection.

The cited passage at col. 5, lines 32-42 reads:

The XML language (see <http://textuality.com/sgml-erb/WD-xml.html>) was developed to extend HTML so that software vendors can add new elements and new element attributes to HTML which are not specifically defined in any HTML standard. The intention is to ensure that all new elements could be parsed by all XML parsers even if the new elements held no significance for any particular XML parser. However, like HTML XML does not provide a standard for the representation of industry, service, product or subject classification, contact or geographic location details within a web page.

The cited passages from Mills do not support the Examiner's position, however. Applicants respectfully submit that Mills teaches a method for building a database which comprises sets of associated property values wherein each set includes at least two property values of different types, the property values being any of classification values, contact values, and geographic location values, collectively referred to as CCG-data. Further, Mills teaches retrieving successive web pages from a computer network and searching each web page for a CCG phrase that includes a plurality of different types of CCG-data attributes.

Further, the passage at col. 5, lines 8-20 teaches an HTML 3.0 standard that provides "class" as an attribute of almost all HTML "<body>" elements, where the "class" attributed is intended to be used with style sheets. In addition, the cited passage at col. 5, lines 32-42 teaches adding new elements and new element attributes to HTML which are not specifically defined in any HTML standard.

As can be seen from the cited passages and as summarized hereinabove, Mills teaches building a database which comprises sets of associated property values. Also, Mills teaches adding *new elements* and *new attribute elements* to HTML. After careful review, Applicants reiterate that Mills does not teach adding a *HTML keyword to the HTML document itself* where the HTML keyword represents the respective one of the plurality of categories of information. That is, Mills does not place a keyword in the document itself to permit searching, as claimed.

Mills fails to teach searching HTML documents by keywords in the documents.

The Examiner argued that Mills is believed to teach calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword. The Examiner cited passages at col. 14 and col. 22, lines 35-67 in support of the rejection.

Here again, the cited passages from Mills do not support the Examiner's position, however. Applicants respectfully submit that Mills teaches searching a database by using word stemming and searching the text of the service classifications held in the *database* to obtain the classification codes. Further, Mills teaches *searching the database* using the *classification codes* to obtain an intermediate list of URLs of web pages containing the CCG codes. In addition, Mills teaches searching the database for the keywords that are the CCG codes to obtain an intermediate list of URLs of web pages containing those words in the web page text.

As can be seen from the cited passages and as summarized hereinabove, Mills teaches *searching a database* based upon *CCG codes*. After careful review, Applicants reiterate that Mills does not teach calling a search engine to execute the activated search, where the activated search includes searching in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword (the same keyword earlier placed *in the document*), and produce a search

result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword. Applicants wish to reiterate that Mills does not teach calling a search engine to execute the activated search *without using a database*, that is, for *keywords placed in the HTML documents*.

Mills fails to teach creating up-to-date pages containing keywords.

The Examiner also argued that Mills is believed to teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword. The Examiner cited the passages at col. 19, lines 35-64, col. 8, lines 58-67, col. 9, lines 1-25 and the abstract in support of the rejection.

The cited passages from Mills does not support the Examiner's position. Applicants have carefully reviewed Mills and submit that Mills teaches providing a list of URLs of web pages or URLs of portions of web pages which contain matching CCG classifications in a HTML document. However, Mills does not disclose the up-to-date web page including the link to the HTML documents *containing the HTML keyword*.

Triggs fails to teach HTML keywords representing categories.

Furthermore, the Examiner relied upon Triggs to teach a HTML keyword, where the HTML keyword represents one of the plurality of categories of information. The Examiner cited the passages at col. 9, lines 36-62, col. 10, lines 58-67, and col. 11, lines 1-11 in support of the rejection.

Applicants have carefully reviewed Triggs and respectfully submit that Triggs teaches a category manager where particular phrases and keywords are associated with a category. Further, in Triggs, the phrases and keywords are automatically generated by the system 20 from the full name of the category. Hence, Applicants submit that Triggs does

not teach a HTML keyword, where the HTML keyword represents one of a plurality of categories of information.

Triggs fails to teach uploading an HTML document containing a keyword.

In addition, the Examiner relied upon Triggs to teach uploading the HTML document. The Examiner cited the passages at col. 4, lines 38-42 in support of the rejection.

The cited passage at col. 4, lines 38-42 reads:

5. Web Builder 150: A simple client program which allows employees with no knowledge of HTML to build simple pages and upload information to the Intranet.

The cited passage from Triggs does not support the Examiner's position, however. Triggs teaches a method for managing information on a computer network having a server, at least one client node and at least one information provider node, and a database at the server containing pre-stored information from the at least one information provider node. In addition, the cited passage does not teach uploading the HTML document that contains a *HTML keyword* representative of one of the plurality of categories of information, to a directory on the web site.

Triggs fails to teach searching as claimed.

Further, the Examiner relied upon Triggs to teach activating a search in the directory when the respective one of the plurality of categories of information is selected. The Examiner cited the passages at col. 3, lines 42-50 and col. 4, lines 14-60 in support of the rejection.

The cited passage at col. 3, lines 42-50 reads:

System 20 has been designed to work with and get the most from the above commercially available products. By using industry

standard, scalable technology system enables organizations to get the most from their information and brings enterprise wide knowledge sharing within reach of all businesses while causing minimal impact on existing information systems, thereby protecting current investments.

The cited passages from Triggs do not support the Examiner's position, however. Applicants respectfully submit that Triggs teaches a system designed to work with and get the most from commercially available products. Further, Applicants have carefully reviewed Triggs and respectfully submit that Triggs does not teach a method for activating a search in a directory when the respective one of the plurality of categories of information is selected.

In view of the deficiencies in the references discussed above, no combination could possibly render the claimed subject matter obvious. Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent claim 1 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

Claim 8 and the Claims Depending Therefrom.

Claim 8 recites, *inter alia*, a method for adding an HTML document to a web site, the HTML document relating to at least one of a plurality of categories of information. The method includes adding an HTML keyword to the HTML document wherein the HTML keyword represents a respective one of the plurality of categories of information, The HTML document is uploaded to a respective one of a plurality of directories on the web site, wherein each of the plurality of directories corresponds to a respective one of the plurality of categories of information, each of the plurality of directories for containing at least one searchable HTML document. A search is activated for the HTML keyword of the at least one searchable HTML documents in the respective one of the plurality of

directories when the respective one of the plurality of categories of information is selected. The search contains at least the HTML keyword. A search engine is called to execute the activated search and produce a search result containing a respective link to each of the at least one searchable HTML documents in the respective one of the plurality of directories containing the HTML keyword. An up-to-date web page is created for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes each respective link to each of the at least one searchable HTML documents containing the HTML keyword.

The Examiner relied upon Mills for teaching adding an HTML keyword to the HTML document wherein the HTML keyword represents one of the plurality of categories of information. Furthermore, the Examiner argued that Mills teaches calling a search engine to execute the activated search and produce a search result where the search result identifies a link to the HTML document in the directory containing the HTML keyword. The Examiner also argued that Mills teaches creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes each respective link to each of the at least one searchable HTML documents containing the HTML keyword.

In addition, the Examiner relied upon Mills for teaching automatically and dynamically creating a web page or HTML of an organization directory for use over the Internet network and storing them in the database with some categories and for display the data that is used to automatically update the databases.

In addition, the Examiner acknowledged that Mills does not explicitly teach that the HTML keyword represents the respective one of the plurality of categories of information, or uploading the HTML document to a respective one of a plurality of directories on the web site as claimed.

Furthermore, the Examiner relied upon Mills for teaching a web page being extracted from web server from there the web page is parsed into text before displaying on the screen, activating or clicking the button to perform the search based on the search criteria or keyword and calling the search engine as well as activating the search by clicking the button.

Furthermore, the Examiner relied upon Triggs to teach a HTML keyword, where the HTML keyword represents one of the plurality of categories of information. The Examiner also argued that Triggs teaches uploading the HTML document and activating a search in the directory when the respective one of the plurality of categories of information is selected.

To the extent that the Examiner relied upon Mills and Triggs for teaching a method for adding an HTML document to a web site, the HTML document relating to at least one of a plurality of categories of information, independent claim 8 and claims depending therefrom are clearly patentable over the cited references for the same reasons as set forth above with reference to claim 1. Accordingly, Applicants respectfully submit that independent claim 8 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

Claim 15 and the Claims Depending Therefrom.

Claim 15 recites, *inter alia*, a method for maintaining a web site via searching including deciding on a plurality of categories of information to be displayed on a web site, and determining a plurality of searches wherein each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine. A keyword is assigned for each respective one of the plurality of categories of information. A plurality of directories is set up wherein each respective one of the pluralities of directories corresponds to a

respective one of the plurality of categories of information. Each of the plurality of directories is designed for containing at least one searchable HTML document. At least one HTML document is created to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword. The at least one assigned keyword is included in an HTML header of the at least one HTML document. A hypertext reference is created for providing the search engine with the at least one of the plurality of searches. The hypertext reference includes an assigned keyword relating to a respective one of the plurality of categories of information, wherein the hypertext reference directs the search engine to search a respective directory relating to the respective one of the plurality of categories of information.

The Examiner relied upon Mills to teach "each of the plurality of searches being executed by a search engine." The Examiner cited passages at col. 2, lines 10-32, col. 14, lines 38-64 and col. 22, lines 25-45 in support of the rejection.

Further, the Examiner also relied upon Mills to teach each of the plurality of directories for containing at least one searchable HTML document. The Examiner cited passages at col. 5, lines 45-61, col. 21, lines 60-67, col. 22, lines 35-67 and col. 23, lines 1-10.

The cited passages from Mills do not support the Examiner's position, however. Applicants respectfully submit that Mills does not teach deciding on a plurality of categories of information to be displayed on a web site. Further, Applicants submit that the cited passages do not teach determining a plurality of searches where each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine.

In addition, the Examiner relied upon Mills for teaching creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword, where the at least one assigned keyword is included in an HTML header of the at least one HTML document. The Examiner cited passages at col. 4, lines 10-30, col. 8, lines 58-67 and col. 9, lines 1-25. However, Applicants have carefully reviewed Mills and respectfully submit that Mills teaches does not teach creating at least one HTML document to be searched. On the contrary, Mills teaches allowing searching of the database by web page classification to provide a list of URLs of web pages or URLs of portions of web pages which contains matching CCG classifications.

The Examiner argued that Mills teaches creating a hypertext reference for providing the search engine with at least one of the plurality of searches, the hypertext reference including an assigned keyword where the hypertext reference directs the search engine to search a respective directory. The Examiner cited passages at col. 11, lines 50-65, col. 22, line 67 and the abstract. However, after carefully reviewing Mills, Applicants respectfully submit that Mills does not teach creating a hypertext reference where the hypertext reference includes an assigned keyword.

Also, the Examiner argued that Mills teaches automatically and dynamically creating a web page or HTML organization directory for use over the Internet network and storing them in the database with some categories and for display the data that is used to automatically update the databases.

In addition, the Examiner acknowledged that Mills does not explicitly teach deciding on a plurality of categories of information to be displayed on a web site, a respective one of the plurality of categories of information.

The Examiner relied upon Triggs for teaching displaying or viewing the information with web browser. The Examiner cited passages at col. 3, lines 18-35 and col. 6, lines 40-54. Applicants have carefully reviewed Triggs and respectfully submit that the cited passages do not teach at least *deciding on a plurality of categories of information* to displayed on a web site.

Further, the Examiner relied upon Triggs for uploading the HTML document, activating a search in the directory when the respective one of the plurality of categories of information is selected and activating a search in the directory when the respective one of the plurality of categories of information is selected. However, Applicants wish to point out that these elements are not recited in claim 15.

Furthermore, the Examiner relied upon Mills and Triggs for teaching a method for maintaining a web site via searching.

However, Applicants respectfully submit that Mills and Triggs do not teach nor does the Examiner argue that the Mills and Triggs specifically teach (1) deciding on a plurality of categories of information to be displayed on a web site; (2) determining a plurality of searches wherein each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine; (3) assigning a keyword for each respective one of the plurality of categories of information; or (4) setting up a plurality of directories wherein each respective one of the pluralities of directories corresponds to a respective one of the plurality of categories of information, each of the plurality of directories for containing at least one searchable HTML document. Absent such teachings, Mills and Triggs cannot teach a case of obviousness.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants

respectfully submit that independent claim 15 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

Claim 22.

Claim 22 recites, *inter alia*, a method for adding an HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information. The method comprises adding an HTML keyword to the HTML document, wherein the HTML keyword represents the respective one of the plurality of categories of information. The HTML document is uploaded to a directory on the web site. A search is activated in the directory when the respective one of the plurality of categories of information is selected. The search contains at least the HTML keyword. A search engine is called to execute the activated search and produce a search result wherein the search result containing a link to the HTML document in the directory containing the HTML keyword. An up-to-date web page is created for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

The Examiner relied upon Mills to teach each of the plurality of searches being executed by a search engine. Further, the Examiner also relied upon Mills to teach the directory for containing at least one searchable HTML document. Further, the Examiner argued that Mills teaches creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword where the at least one assigned keyword is included in an HTML header of the at least one HTML document. In addition, the Examiner relied upon Mills for teaching creating a hypertext reference for providing the search engine with at least one of the plurality of searches, the hypertext reference including an assigned keyword where the hypertext reference directs the search engine to search a respective directory.

In addition, the Examiner relied upon Mills for teaching automatically and dynamically creating a web page or HTML of an organization directory for use over the Internet network and storing them in the database with some categories and for display the data that is used to automatically update the databases.

In addition, the Examiner acknowledged that Mills does not explicitly teach deciding on a category of information to be displayed on a web site, a respective one of the plurality of categories of information. The Examiner relied upon Triggs for teaching displaying or viewing the information with web browser.

Further, the Examiner relied upon Triggs for uploading the HTML document, activating a search in the directory when the respective one of the plurality of categories of information is selected and activating a search in the directory when the respective one of the plurality of categories of information is selected. However, Applicants, here again, wish to point out that the above mentioned elements are not recited in claim 22.

As discussed with respect to claim 15, the Examiner relied upon Mills and Triggs for teaching a method for maintaining a web site via searching. However, Applicants respectfully submit that Mills and Triggs do not teach, nor does the Examiner argue that Mills and Triggs specifically teach (1) deciding on a category of information to be displayed on a website; (2) determining a search corresponding to the category of information, the search being executed by a search engine; (3) assigning a keyword for the category of information; and (4) setting up a category that corresponds to the category of information, the directory containing at least one searchable HTML document. Absent such teachings, Mills and Triggs cannot teach a case of obviousness.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants

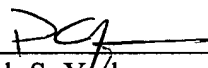
respectfully submit that independent claim 22 is clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: 4/25/2005



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